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## ATTORNEYS FOR DEFENDANTS

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DISTRICT

DAVID HOUGH, et al.

Case No.: 2:24-cv-02886

*Plaintiffs,*

Assigned for all purposes to:  
**JUDGE WESLEY L. HSU**

V.

**DECLARATION OF RYAN  
CARROLL ON BEHALF OF YAX  
ECOMMERCE LLC D/B/A  
WEALTH ASSISTANTS LLC IN  
SUPPORT OF MOTION TO  
RELEASE FUNDS**

Hearing: 1/10/2025, 1:30 p.m. PT

RYAN CARROLL, et al.

Action Filed: April 9, 2024  
Trial Date: N/A

BEFORE ME, the undersigned authority, on this day personally appeared **Ryan Carroll**, and being duly sworn upon his oath by me, deposed and stated as follows:

1. "My name is **Ryan Carroll**. I am over eighteen (18) years of age, and I have never been convicted of a crime. I am of sound mind and capable of making this

1 Declaration. The facts set forth herein are based on my personal knowledge and are  
2 true and correct. I am competent to testify to the facts herein.

3 2. "I have sole and controlling interest in Yax Ecommerce.

4 3. "I submit this declaration to provide information regarding the source of funds  
5 that I will use to pay legal counsel.

6 4. "Yax Ecommerce filed for bankruptcy on November 26, 2024 and a  
7 Suggestion of Bankruptcy was filed with this Court on December 7, 2024. (Dkt.  
177)

8 5. "I do not seek release of funds that are assets of Yax Ecommerce or in Yax  
9 Ecommerce's name.

10 6. "I recently sold my vehicle, a 2017 Mercedes Benz G63, and will use the  
11 proceeds from this sale to contribute toward my legal fees.

12 7. "I am prepared to allocate the availability of these funds and maintain my  
13 defense.

14 8. "I am committed to ensuring the timely payment of all fees and costs  
15 associated with my new legal representation to facilitate the progress of this matter.

16 I declare under the laws of the State of California that the foregoing is true  
17 and correct."

18 FURTHER AFFIANT SAYETH NOT.

19 *Ryan Carroll*  
20 **RYAN CARROLL**

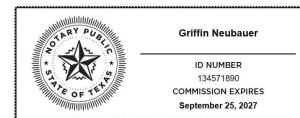
21 2025 SWORN TO AND SUBSCRIBED before me on this 8<sup>th</sup> day of January,  
22 20, by Ryan Carroll, who is personally known to me or has produced [form of  
23 identification] as identification. PASSPORT

24 [Notary Seal]



25 26 NOTARY PUBLIC, State of Texas Denton County

27 28 My Commission Expires: 09/25/2027



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service in this court on this **January 8, 2025**, via email as follows:

/s/ William Shibley  
William Shibley